UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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CHEVRON CORPORATION,   :
                                                    :
                Plaintiff,   :
                                                    :   Case No. 11 Civ. 0691 (LAK)
     v.   :
                                                    :
                                                    :
                                                    :
STEVEN DONZIGER, et al.,   :
                                                    :
                Defendants.   :
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                                                    :
- x

DECLARATION OF JASON STAVERS ON BEHALF OF
CHEVRON CORPORATION IN OPPOSITION TO DONZIGER DEFENDANTS'
MOTIONS FOR STAYS AND PROCEDURAL SAFEGUARDS

I, JASON B. STAVERS, hereby declare under penalty of perjury pursuant to 28 U.S.C.

§ 1746, that the following is true and correct:

1.   I am an attorney licensed to practice law in the State of Colorado and admitted to

practice before this Court pro hac vice. I am an associate at the law firm of Gibson, Dunn &

Crutcher LLP and counsel of record for Chevron Corporation ("Chevron") in the above-

captioned matter. I am personally familiar with the facts set forth herein, unless the context

indicates otherwise.

2.   I make this declaration on behalf of Chevron Corporation in opposition to the

Donziger Defendants' Motions for Stays and Procedural Safeguards.

3.   Attached hereto as Exhibit 1, which is marked confidential and has been filed

under seal pursuant to the Protective Order in this action (Dkt. 723), is a true and correct copy of

excerpts from the transcript of the deposition of Juan Pablo Albán Alencastro, taken in this

action on May 24, 2013.

4.   Attached hereto as Exhibit 2, which is marked confidential and has been filed

under seal pursuant to the Protective Order in this action (Dkt. 723), is a true and correct copy of excerpts from the rough transcript of the Federal Rule of Civil Procedure 30(b)(6) deposition of Kroll, Inc., represented by Daniel Karson, taken in this action on June 10, 2010.

5.   Attached hereto as Exhibit 3 is a true and correct copy of excerpts from the transcript of the deposition of Steven Donziger, taken in a related action before this Court on November 29, 2010.

6.   Attached hereto as Exhibit 4 is a true and correct copy of an email from Joe Silver to Doug Beltman, with Martin Beier and Sharon Ingram copied, dated April 22, 2010, and Bates stamped STRATUS PARTIES 4154-55.

7.   Attached hereto as Exhibit 5, which is marked confidential and has been filed under seal pursuant to the Protective Order in this action (Dkt. 723), is a true and correct copy of excerpts from the transcript of the deposition of Raúl Rosero Rivas, taken in this action on May 22, 2013.

8.   Attached hereto as Exhibit 6, which is marked confidential and has been filed under seal pursuant to the Protective Order in this action (Dkt. 723), is a true and correct copy of excerpts from the transcript of the deposition of Dr. Farith Simon Campaña, taken in this action on June 8, 2013.

9.   Attached hereto as Exhibit 7, which is marked confidential and has been filed under seal pursuant to the Protective Order in this action (Dkt. 723), is a true and correct copy of excerpts from the transcript of the deposition of Joseph Kohn, taken in this action on June 6, 2013.

10.   Attached hereto as Exhibit 8 is a true and correct copy of Chevron Corporation and Texaco Petroleum Company's Reply Memorial, redacted to prevent disclosure of confidential information, which was submitted in the Bilateral Investment Treaty Arbitration

between Chevron Corporation, Texaco Petroleum Company and the Republic of Ecuador,

captioned *In the Matter of An Arbitration Under the Rules of the United Nations Commission on*

International Trade Law, on June 5, 2013.

11.   Attached hereto as Exhibit 9 is a true and correct copy of Annex A to Chevron

Corporation and Texaco Petroleum Company's Reply Memorial, which was submitted in the

Bilateral Investment Treaty Arbitration between Chevron Corporation, Texaco Petroleum

Company and the Republic of Ecuador, captioned *In the Matter of An Arbitration Under the*

Rules of the United Nations Commission on International Trade Law, on June 5, 2013.

12.   Attached hereto as Exhibit 10 is a true and correct copy of excerpts from the

transcript of the deposition of Dr. Jeffrey Short, an expert retained by the Republic of Ecuador,

which was taken in a related arbitral proceeding on May 7, 2013.

13.   Attached hereto as Exhibit 11 is a true and correct copy of excerpts from the

transcript of the deposition of Dr. Harlee Strauss, an expert retained by the Republic of Ecuador,

which was taken in a related arbitral proceeding on April 23, 2013.

14.   Attached hereto as Exhibit 12 is a true and correct copy of excerpts from the

transcript of the deposition of Dr. Edwin Theriot, an expert retained by the Republic of Ecuador,

which was taken in a related arbitral proceeding on April 18, 2013.

15.   Attached hereto as Exhibit 13 is a true and correct copy of excerpts from the

transcript of the deposition of Kenneth Goldstein, an expert retained by the Republic of Ecuador,

which was taken in a related arbitral proceeding on May 13, 2013.

16.   Attached hereto as Exhibit 14 is a true and correct copy of an email chain from

Steven Donziger to Grant Fine, dated December 28, 2009, and Bates stamped DONZ00130672.

17.   Attached hereto as Exhibit 15 is a true and correct copy of an email chain from Jefferson Bell to Julio Gomez and Steven Donziger, with Jennifer Rearden and Sripriya Narasimhan copied, dated June 5, 2013.

18.   Attached hereto as Exhibit 16 is a true and correct copy of an email from Avi Weitzman to Justin Ormand, with Max Gitter, Theodore Katz, Steven Donziger, Julio Gomez, Randy Mastro, Andrea Neuman, Pete Seley, and Rebecca Gray copied, dated May 30, 2013.

19.   Attached hereto as Exhibit 17 is a true and correct copy of an email exchange among Nikki Vo, Sogol Pirnazar, Matthew Werdegar, Larry Veselka, Garland Murphy, Michael Sims, with Christopher Joralemon, Ethan Dettmer, and Caroline Mitchell copied, dated February 19, 2013.

20.   Attached hereto as Exhibit 18 is a true and correct copy of an email from Steven Donziger to Max Gitter, Theodore Katz, Justin Ormand, Randy Mastro, Andrea Neuman, and Avi Weitzman copied, dated May 20, 2013.

I declare under penalty of perjury that the foregoing is true and correct. Executed on June 12, 2013 at New York City, New York.

Jason Stavers